

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KYUNG RAN LEE,

Plaintiff,

v.

**COMPASSIONATE CARE, INC., JAE HO
SUH, SOO AHN, and HYUN CHONG,**

Defendants.

Case No. **16-cv-9280**

JOINT MOTION TO APPROVE SETTLEMENT AND TO DISMISS

By and through their respective attorneys of record, Plaintiff and Defendants jointly move this court to approve their settlement agreement and to dismiss the underlying action. In support of the motion, the parties state as follows:

1. The Plaintiff filed her complaint in the above-captioned action on September 27, 2016.
2. The complaint asserts claims for unpaid wages under Illinois and federal law.
3. No class has been certified by the Court, and no individuals have filed consents to join the purported collective action.
4. The Defendants deny each and every allegation of wrongful conduct in the complaint and deny that any amounts or other relief are owing to the Plaintiff.
5. The parties have now agreed to a full and final settlement of this action in order to avoid the time, expense and aggravation associated with protracted litigation.
6. In order to effectuate a valid and enforceable release of the Plaintiff's claim for unpaid wages, liquidated damages, attorneys' fees and all other alleged damages under all applicable laws, including the Fair Labor Standards Act and Illinois law, court approval of the

settlement agreement is required. *O'Brien v. Encotech Const. Servs., Inc.*, 183 F. Supp. 2d 1047 (N.D. Ill. 2002).

7. Submitted (*in camera* only) as Exhibit A to the proposed dismissal order is the parties' confidential settlement agreement.

8. Submitted for convenience as Exhibit B is a draft order of dismissal.

WHEREFORE the parties jointly pray that this court enter the order attached as Exhibit B, approving the settlement agreement as a fair and reasonable resolution of a bona-fide dispute under both federal and state wage-hour laws.

/s/ Ryan J. Kim

Attorney for Plaintiff

Ryan J. Kim

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/s/Julie Badel

Attorney for Defendants

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312-499-1400

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on August 30, 2017, she caused a true and correct copy of the foregoing Joint Motion to Approve Settlement and to Dismiss to be filed and uploaded to the CM/ECF system which will send notice of such filing to:

Ryan J. Kim, Esq.
INSEED LAW, PC
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/s/Julie Badel